



March 7, 2017

Re: WT Docket No. 16-421  
COMMENT SOUGHT ONSTREAMLINING DEPLOYMENT OF SMALL CELL INFRASTRUCTURE  
BY IMPROVING WIRELESS FACILITIES SITING POLICIES

To Whom It May Concern:

CalWA hereby submits, below, our initial comments as requested by the FCC. It is our intent to submit additional and more comprehensive comments after reviewing all comments submitted to the FCC.

Over the last ten years, the California Wireless Association (CalWA) has sought to bring a unified voice to the wireless industry. CalWA's focus during this time has been to provide general awareness of the wireless industry, educate consumers and public officials, and advocate for critical wireless infrastructure in the State of California. Due to CalWA's longtime voice in wireless and commitment to serving the above mission, CalWA's membership has grown to include a large variety of professionals working in the wireless industry, including wireless carriers, infrastructure providers, and local government representatives.

To briefly summarize, the regulatory environment regarding wireless infrastructure remains gridlocked and frustrating. A substantial amount of local governments do not yet have code that even contemplates small cell infrastructure and deployment. This means that each small cell "node" often has to go through an individual zoning application meant for a traditional "macro" site. Even more problematic, certain jurisdictions are updating their code to intentionally prevent deployment and/or provide barriers to deployment in the ROW.

Without clear guidelines from the FCC regarding the deployment of small cell infrastructure, our constituents and the public will continue to see lengthy, cost prohibitive application processes. Currently, the exact same deployment project can take years to complete in one City, and 30 days in their neighboring jurisdiction. The extreme variance between local governments regarding siting applications leaves it nearly impossible to effectively plan and upgrade critical wireless infrastructure.

In addition to a lack of consistency across jurisdictions regarding small cell infrastructure, CalWA members continue to report that Section 6409 applications are not being treated appropriately by local jurisdictions. Some localities have checklists which require submittal materials far exceeding what the FCC has limited application scope too, many of which seem meant only to delay modifications to existing infrastructure. Others still require traditional new site build applications, along with those checklists, any time existing infrastructure is modified, no matter how minor those modifications are.

CalWA is encouraged that the FCC has requested comments regarding the current state of the local regulatory framework in wireless. We remain hopeful that the FCC will institute guidelines that result in consistency, common sense, and fairness. Without such guidelines being implemented, it is clear that local governments will continue to delay and deny siting applications. Especially regarding small cell in the ROW, many such applications seem to be delayed simply because they are "new" and jurisdictions

have not seen them before. As the need for deployment of more infrastructure is recognized nearly universally, CalWA urges the FCC to act such that this need can be satisfied. The health, safety, and advancing world demands it.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Ringo". The signature is written in black ink on a light-colored background.

Patricia Ringo  
President  
California Wireless Association